

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

IN RE PORK ANTITRUST LITIGATION

Court File No. 18-cv-1776 (JRT/JFD)

This Document Relates To:

Commonwealth of Puerto Rico v. Agri Stats, et al., No. 19-cv-2723 (JRT/JFD)

Sysco Corporation v. Agri Stats Inc., et al., No. 21-cv-1374 (JRT/JFD)

Amory Investments LLC v. Agri Stats, Inc., et al., No: 21-cv-1697 (JRT/JFD)

**DECLARATION OF JESSICA J.
NELSON**

I, Jessica J. Nelson, declare under penalty of perjury that the following is true and correct:

1. I am a partner with the law firm of Spencer Fane LLP and counsel for Defendant JBS USA Food Company, (“JBS USA”) in the above-referenced matter. I submit this Declaration in conjunction with JBS USA’s Opposition to Motion to Compel filed by Direct Action Plaintiffs Sysco Corporation, Amory Investments, Inc., and the Commonwealth of Puerto Rico (the “Moving DAPs”). The facts stated herein are based on my personal knowledge and/or examination of the documents cited below.

2. JBS USA has produced over 2.8 million pages of documents in this litigation at considerable expense and burden, including all versions of its codes of conduct that were applicable during the relevant time period of January 1, 2008 through June 30, 2018.

3. In addition to the Rule 30(b)(6) deposition of Ross Manternach, JBS USA has also provided substantial testimony in eight depositions of JBS USA fact witnesses under Rule 30(b)(1) (with another fact witness deposition to be taken on December 12, 2022).

4. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts of the transcript of the Rule 30(b)(6) deposition of JBS USA Food Company by its representative Ross Manternach, dated September 27, 2022.

5. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts of the transcript of the deposition of Martin Dooley, dated September 13, 2022.

6. Attached hereto as **Exhibit 3** is a true and correct copy of excerpts of the transcript of the deposition of Garry Albright, dated June 1, 2022.

7. Attached hereto as **Exhibit 4** is a true and correct copy of excerpts of the transcript of the deposition of Tim Hiller, dated October 14, 2022.

8. Attached hereto as **Exhibit 5** is a true and correct copy of excerpts of the transcript of the deposition of Jerry Brooks, dated October 31, 2022.

9. Attached hereto as **Exhibit 6** is a true and correct copy of excerpts of the transcript of the deposition of Brad Lorenger, dated July 26, 2022.

10. Attached hereto as **Exhibit 7** is a true and correct copy of excerpts of the transcript of the deposition of Shawn Mills, dated October 28, 2022.

11. Attached hereto as **Exhibit 8** is a true and correct copy of excerpts of the transcript of the deposition of Tim Uber, dated July 29, 2022.

12. Attached hereto as **Exhibit 9** is a true and correct copy of excerpts of the transcript of the deposition of Dale DeGroot, dated September 23, 2022.

13. Attached hereto as **Exhibit 10** is a true and correct copy of excerpts of Defendant Hormel Foods Corporation's Objections and Responses to Plaintiffs' Notice of Deposition Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, dated September 21, 2022.

14. Attached hereto as **Exhibit 11** is a true and correct copy of excerpts of Defendant Seaboard Foods LLC's Objections to Plaintiffs' Notice of Deposition Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, dated September 2, 2022.

15. Attached hereto as **Exhibit 12** is a true and correct copy of email correspondence between counsel for Triumph Foods, LLC and counsel for Plaintiffs between September 6, 2022 and September 14, 2022.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 2, 2022.

/s/ Jessica J. Nelson
Jessica J. Nelson